

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

EDWARD BRONSON and  
E-LIONHEART ASSOCIATES, LLC,  
d/b/a FAIRHILLS CAPITAL,

Defendants,

- and -

FAIRHILLS CAPITAL, INC.

Relief Defendant.

Case No. 7:12-cv-06421-KMK

**NOTICE OF DEFENDANTS' MOTION FOR RELIEF FROM THE  
CONTEMPT JUDGMENT AND SUBSEQUENT ORDERS**

PLEASE TAKE NOTICE that upon the accompanying Supplemental Memorandum of Law and the papers, pleadings, and prior proceedings herein, Defendant Edward Bronson respectfully moves for the following relief: that this Court vacate its Contempt Judgment (ECF No. 223) and subsequent incarceration orders (ECF Nos. 302, 321 & 326) pursuant to Federal Rule of Civil Procedure 60(b)(4) and (b)(6).

**[SIGNATURE BLOCK ON FOLLOWING PAGE]**

Dated: March 9, 2022

Respectfully submitted,

/s/ Ryan D. O'Quinn

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*Attorney for Defendant  
Edward Bronson*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this March 9, 2022, a true and correct copy of the foregoing  
was furnished by via CM/ECF upon all counsel of record and entitled parties.

/s/ Ryan D. O'Quinn

Ryan D. O'Quinn